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12  
13 **UNITED STATES BANKRUPTCY COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA**  
15 **SAN FRANCISCO DIVISION**

16 **In re:**

17 **PG&E CORPORATION**

18 **-and-**

19 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

20 **Debtors**

21  Affects PG&E Corporation  
22  Affects Pacific Gas and Electric Company  
23  Affects both Debtors

24 \*All papers shall be filed in the Lead Case,  
25 No. 19-30088 (DM)

26 Bankruptcy Case No.  
19-30088 (DM)

27 Chapter 11  
(Lead Case)  
(Jointly Administered)

28 **DECLARATION OF LAUREN T.  
ATTARD IN SUPPORT OF EX PARTE  
APPLICATION OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
PURSUANT TO B.L.R. 9013-1(c) FOR  
ENTRY OF AN ORDER AUTHORIZING  
OVERSIZE BRIEFING FOR  
OPPOSITION TO THE DEBTORS'  
MOTION PURSUANT TO 11 U.S.C.  
§§ 105(a) AND 502(c) FOR THE  
ESTABLISHMENT OF WILDFIRE  
CLAIMS ESTIMATION PROCEDURES  
[Dkt. No. 3091]**

1 Lauren T. Attard, under penalty of perjury, declares:

2 1. I am an attorney at Baker & Hostetler, LLP (“**Baker Hostetler**”), counsel to the  
3 Official Committee of Tort Claimants (hereafter, the “**TCC**”) in the above captioned chapter 11  
4 cases of PG&E Corporation and Pacific Gas and Electric Company (collectively, the “**Debtors**” or  
5 “**PG&E**”).

6 2. I submit this Declaration in support of the Ex Parte Application of the Official  
7 Committee of Tort Claimants Pursuant to B.L.R. 9013-1(c) for Entry of an Order Authorizing  
8 Oversize Briefing for the Opposition to the Debtors’ Motion Pursuant to 11 U.S.C. §§ 105(a) and  
9 502(c) for the Establishment of Wildfire Claims Estimation Procedures [Dkt. No. 3091] (the  
10 “**Application**”). The Application is filed concurrently herewith.

11 3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts  
12 set forth herein.

13 4. On July 18, 2019, the Debtors filed the Motion Pursuant to 11 U.S.C. §§ 105(a) and  
14 502(c) for the Establishment of Wildfire Claims Estimation Procedures (the “**Estimation**  
15 **Motion**”).

16 5. On July 24, 2019, the Court held a status conference on the Estimation Motion, the  
17 TCC’s Motion for Relief from the Automatic Stay to Permit State Court Jury Trial of 2017 Tubbs  
18 Wildfire Claims [Dkt Nos. 2842, 2904], and the Motion of the Ad Hoc Group of Subrogation Claim  
19 Holders for Relief from the Automatic Stay [Dkt No. 2863]. At the status conference, the Court  
20 stated that it recognized the complexity of the issues raised by the parties in their respective motions  
21 and the interplay of the relief sought in each. July 24, 2019 Hrg. Tr. at 18. The Court provided  
22 comments to the motions and requested clarification on various issues, which the Court directed  
23 the parties to address in their responsive briefing. *Id.* at 19-28.

24 6. The TCC now seeks to file its opposition to the Estimation Motion (the  
25 “**Opposition**”).

26 7. To adequately respond to the complex issues raised in the Estimation Motion and  
27 address the Court’s questions and comments that must be considered in conjunction with the relief  
28

requested by the Debtors, the TCC respectfully submits it is necessary for the TCC to exceed the 25-page limit.

8. I do not believe that the relief requested herein will prejudice the Debtors or interested parties, nor do I believe the relief requested on behalf of the TCC is extraordinary or unreasonable in light of the circumstances.

9. The TCC therefore respectfully requests that the Court enter an order allowing the TCC to file an opposition to the Estimation Motion that exceeds 25 pages.

10. Prior to filing the Application, I contacted Kevin Orsini, counsel for the Debtors, to inquire whether Debtors would oppose or have no objection to the relief sought therein. Mr. Orsini responded today that the Debtors consent to the relief requested herein.

*Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.*

Executed on August 7, 2019

By: /s/ Lauren T. Attard  
Lauren T. Attard